

CERCLIS ARCHIVE BACKGROUND AND GUIDELINES

6/15/95

The following guidelines are intended to assist EPA Regions in completing the new site level archive fields recently added to WasteLAN. For consistency, certain commonly used terms are defined below for purposes of this document:

EVENT LEVEL FIELD: The event level in CERCLIS/WasteLAN refers to the individual Superfund remedial and removal events (e.g., PA-Preliminary Assessment, SI-Site Inspection, RV-Removal Action) along with the decisions that have been recorded at the conclusion of these events (e.g., H-higher priority, L-lower priority, N-no further remedial action planned, D-deferred to RCRA Subtitle C or NRC, etc.). A Site Inspection Prioritization (SIP) is a subevent to an SI but is treated as an event throughout this document since the decision reached at the conclusion of a SIP is recorded at the related SI event.

SITE LEVEL FIELD: The Site level in CERCLIS/WasteLAN applies to a site in its entirety (e.g., site ID, name, and location).

SITE ASSESSMENT: Site assessment refers to the federal Superfund REMEDIAL assessment events (e.g., PA, SI, SIP) and does not include removal events or enforcement actions.

BACKGROUND

On January 25, 1995, the EPA Administrator announced the removal of approximately 25,000 sites from the Superfund inventory as part of the Brownfields initiative. This figure was derived by identifying the number of CERCLIS sites where the last site assessment event had a No Further Remedial Action Planned (NFRAP) decision and at which no removal events were recorded. Additional criteria used to identify these sites for removal from CERCLIS are provided in the following sections.

On February 15, 1995, OERR implemented two new site level archive fields in CERCLIS to distinguish archive sites (sites with no further Superfund interest) from active sites (sites with Superfund involvement that now constitute the Superfund inventory). The two new fields are: 1) NFRAP Indic(ator) [C145]; and 2) NFRAP Date [C146]. Due to the short time frame provided for this effort and the high volume of sites, Headquarters automatically assigned values to these fields primarily based on site assessment NFRAP criteria and Regional feedback on selected sites. These fields were updated in the March 7, 1995, CERCLIS database using the same criteria.

A WasteLAN revision containing the new site level archive fields was made available on March 15, 1995, providing the

Regions with the capability to update and modify this archive information. Headquarters will no longer directly update the archive fields as a result. This is now the responsibility of the Regions.

Please note EPA will still retain access to archived site information for historical record-keeping purposes and to avoid needlessly repeating evaluations at sites.

CLARIFICATION OF TERMS

Some confusion has arisen over the dual use of the acronym "NFRAP". The NFRAP acronym has historically been used by the Headquarter and Regional Site Assessment Programs at the conclusion of site assessment activities (eg., PA, SI) to denote that No Further Remedial Action is Planned at a CERCLIS site. This is recorded in CERCLIS by placing a value of 'N' in the Event Qualifier field on the Event Summary screen for the appropriate site assessment event. Under this use, the decision to NFRAP a site has never required the Regions to consider whether removal actions, cost recovery, or other non-remedial work is being performed under Superfund since it has always been used to simply screen sites from further site assessment activities.

The National Contingency Plan (NCP) references NFRAP in several places but describes the acronym as No Further Response Action Planned and states that no further Superfund interest, of any kind, is warranted.

The NFRAP Indicator fields recently added to the site level WasteLAN screens represent a NFRAP decision as described in the NCP. Sites with a site level NFRAP indicator of "NFA" will be physically removed (archived) from the CERCLIS database in the near future. These sites should not have any further Superfund interest based on currently available information.

To avoid further confusion in nomenclature, EPA plans to amend the NCP to replace the NFRAP acronym with the term "Archive". Archive will indicate that no further federal steps under CERCLA will be taken at a site unless future information so warrants (i.e. no further federal Superfund interest based on currently available information). The WasteLAN/CERCLIS "NFRAP Indicator" field will soon be renamed to "Archive Indicator" to help alleviate confusion over the NFRAP acronym. The "Archive" term is used throughout the remainder of this document to clarify archive versus nfrap issues.

The "NFRAP" acronym will continue to be used as a decision reached at the conclusion of a site assessment event to indicate "No Further Remedial Action Planned" (i.e. no further site assessment work planned, NPL listing not appropriate).

ARCHIVE FIELD DESCRIPTIONS

The Archive Indicator (currently labeled NFRAP Indicator in CERCLIS/WasteLAN) is an alphanumeric field which contains either the letters "NFA" or is blank. An NFA value in this field designates the site as an archive site. An Archive Indicator with a blank value (ie., ' ') indicates the site is still in the Superfund inventory. The Archive Date (currently labeled NFRAP Date in CERCLIS/WasteLAN) is a date field containing the actual completion date of the site assessment event, removal event, or enforcement activity that signals the completion of Superfund interest at a site (e.g., actual completion date of a preliminary assessment which is the last event at the site and at which a NFRAP decision was made and no other Superfund interest exists; or actual completion date of an enforcement action if it represents the final Superfund involvement at the site.

The archive fields are related to each other. The Archive Date field must be completed if the Archive Indicator contains "NFA" and vice-versa. Both fields require manual entry, and are not system generated. Values for both fields must be blank for sites still in the Superfund inventory.

INITIAL ARCHIVE CRITERIA

The following describes the criteria used by Headquarters to assign values to the new site level Archive Indicator:

Sites were designated archive in the February and March 1995, databases if:

- The NPL indicator was 'N' (site not proposed and not on NPL); and
- The last completed site assessment event at a site had a NFRAP decision. This determination appears as an "N" in the event qualifier field in WasteLAN. Note: Decisions made upon completion of a Site Inspection Prioritization subevent are recorded in the related Site Inspection event qualifier field.

The following site assessment events were considered for this project:

Preliminary Assessment (PA)
Site Inspection (SI)
Site Inspection Prioritization (SP) (Subevent to SI)
Expanded Site Inspection (ES)
Integrated ESI/Remedial Investigation (SS)
Hazard Ranking System Package (HR)

EXCEPT IF:

- The site had a planned or actual site assessment event start subsequent to the latest completed site assessment event; or
- One of the following removal events were recorded at the site: Planned Removals (PR), Immediate Removals (IR), Removal Actions (RV), and UST Removals (UR); or
- An Agency for Toxic Substances and Disease Registry (ATSDR) petition was issued for the site; or
- The Regions specifically requested a site not be archived.

Special Considerations

Special consideration was given to sites which had multiple events with identical completion dates. These sites accounted for a very small percentage of the CERCLIS inventory. Specifically:

- If a site had multiple site assessment events of different types but with the same actual completion date (e.g., PA and SI), the latest site assessment event had to have a NFRAP event qualifier to be designated an archive site. Site Assessment events from earliest (left) to latest (right) are as follows:

DS - PA - SI/SP - ES - SS - HR

- If a site had multiple site assessment events of the same type (e.g., 2 PA events) with the same actual completion date, and these were the last completed site assessment events at the site, both events had to have event qualifiers of NFRAP to receive an archive designation.

The above criteria were conservatively based on information available in CERCLIS. The approach resulted in maintaining an active status for several categories of sites, such as sites deferred to RCRA or NRC, sites with removal events, and sites removed from the Proposed or Final NPL. Sites in these categories may be potential archive sites and are further described in the Suggested Archive Guidelines section below.

SUGGESTED ARCHIVE GUIDELINES

As indicated above, Headquarters conservatively assigned an archive status to sites based on information readily available in CERCLIS. Regional expertise along with State input is required to confirm currently archived sites and to designate additional archive sites from the Superfund inventory. The following

guidelines are intended to assist the Regions in making additional archive determinations.

Sites With Site Assessment Events Only and NFRAP Decisions

Sites with NFRAP decisions made at the conclusion of the last site assessment event (as indicated above) and which do not have a removal event or other Superfund interest should be designated as an archive site.

Site Assessment Sites With NFRAP Decisions and Removal/Other Events

Sites with NFRAP decisions made at the conclusion of the last site assessment event and which also have a removal or other event need to be researched to determine whether further Superfund interest is warranted. If all enforcement actions corresponding to removal events are completed and no other Superfund involvement is anticipated, the site should be designated archive.

Sites Deferred to RCRA

In general, sites deferred to the Resource Conservation and Recovery Act (RCRA) Subtitle C program based on the last completed site assessment event and which do not have other Superfund interest are candidates for archival. The NPL/RCRA policy, as discussed in Federal Register notices 51 FR 23978 (June 24, 1988), 54 FR 10520 (March 13, 1989), and 54 FR 41000 (October 4, 1989), provides that Superfund generally will address RCRA facilities only if the owner/operator is found to be unable or unwilling to perform RCRA Corrective Action at the facility, or meets certain other defined conditions (primarily non- or late filer, pre-HSWA permittees who will not modify the permit to include Corrective Action, or converter status).¹ This policy should be followed when determining which sites to evaluate under Superfund for potential NPL listing and which sites to defer to RCRA Subtitle C. The Regional Superfund and RCRA programs should work together when making this determination.

In general, sites that meet the criteria for Superfund evaluation but which are not viable NPL candidates (i.e. would not score 28.5 or above) should have **NFRAP** decisions recorded at the appropriate site assessment event and should be archived using the new site level archive fields if no further Superfund interest currently exists. Sites which will be addressed under

¹ An exception to the NPL/RCRA policy involved the Environmental Priorities Initiative (EPI). EPI, which ended in FY 92, was developed in order to use Superfund resources and expertise to assess certain RCRA facilities, storage and treatment facilities, and closed and closing incinerators. The intent of EPI was to assist RCRA in its prioritization of the sites that it needs to address under Corrective Action.

RCRA should have **Deferred** decisions recorded at the appropriate site assessment event and should also be archived (by definition, no further Superfund interest should exist at these sites).

Sites currently coded in CERCLIS as "Deferred to RCRA Subtitle C" which after further review are appropriate for further Superfund evaluation should remain in CERCLIS, and the deferred event qualifier should be changed accordingly in CERCLIS/WasteLAN. Prior to reactivating or entering any new RCRA facilities into CERCLIS, the RCRA Program should ensure these facilities meet the specific criteria which would warrant NPL consideration under the NPL/RCRA listing policy. Sites eligible for Superfund consideration may still be archive candidates based on other criteria described in this section. Any changes to site priorities should be justified with a note of explanation in the site file.

Sites Deferred to NRC

Sites where the last site assessment decision made was deferral to Nuclear Regulatory Commission (NRC) and where no further Superfund interest exists are also archival candidates. The Superfund policy for NRC deferral grants EPA discretion in transferring responsibility of NRC licensed facilities to NRC. This decision is made in circumstances where the EPA deems that the NRC's clean-up expertise warrants the transfer of responsibility. This policy is discussed in more detail in Federal Register notice 48 FR 40661 (September 8, 1983).

Sites Removed From Proposed or Final NPL

Sites removed from the Proposed or Final NPL which will not be rescored for reproposal to the NPL and which do not have any further Superfund interest should be designated as archive sites.